

## Exhibit C

(Menendez April 24 Richardson Notice)

PAUL  
HASTINGS

April 19, 2024  
Page 2

withdrawing and storing cash in his home. Dr. Rosenbaum's conclusions are also based on her experience and research that demonstrates that such coping mechanisms are a common response to scarcity among trauma victims, especially for those who suffer from intergenerational trauma.

In addition to her experience and research, Dr. Rosenbaum's conclusions are based on evaluations she conducted of Senator Menendez, as well as a review of discovery produced in the case, including photographs of the cash seized from Senator Menendez's home, Senator Menendez's bank records, and photographs taken of the interior of Senator Menendez's home, as well as her review of relevant scientific literature.

Russell Richardson

Senator Menendez anticipates calling Russell Richardson, CPA, CFE, as an expert witness pursuant to Federal Rule 16(b)(1)(c). Mr. Richardson's qualifications are set forth in his curriculum vitae, which is attached.

Mr. Richardson is expected to testify that Senator Menendez's spending habits throughout the relevant time were consistent with his income and compensation as a U.S. Senator and from a rental property he owns; that is, that Senator Menendez lived within his means. He is also expected to testify that Senator Menendez did not, during the relevant time, regularly make extravagant purchases nor did he excessively transfer funds or items of value to any other person (including his wife, Nadine Menendez).

Mr. Richardson is expected to testify that his conclusions are based upon review of records of Senator Menendez's depository accounts, credit card statements, tax returns, financial disclosures and related financial documents, interview(s) with the Senator, and Mr. Richardson's training and experience as a forensic accountant.

Senator Menendez reserves the right to supplement this notice with notice of additional potential expert witnesses and/or additional information concerning the witnesses disclosed herein.

Truly yours,

/s/ Adam Fee

Adam Fee  
Avi Weitzman

*Attorneys for Defendant Robert Menendez*

*Handwritten:*  
4/23/24